

13- MJ - 4087 - DHA

**AFFIDAVIT SPECIAL AGENT TUCKER J. HEAP**

I, Special Agent Tucker Heap, being duly sworn, depose and state as follows:

1. I am a special agent with the Federal Bureau of Investigation ("FBI"). I have been employed by the FBI since June 2006 and am assigned to the Boston Division. I am assigned to the Boston Organized Crime Drug Enforcement Task Force ("OCDETF") Strike Force, which consists of federal law enforcement to include the Drug Enforcement Administration ("DEA"), Homeland Security Investigations ("HSI"), the United States Marshals Service ("USMS"), the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), and other state and local law enforcement agencies.

2. I personally have participated in almost all aspects of drug investigations. I have utilized various investigatory tools and techniques, including confidential informants, cooperating witnesses, physical surveillance, and witness interviews. I am familiar with the benefits and limitations of these techniques. I am familiar with the methods of operation, including distribution, storage, and transportation of drugs and the collection of currency that constitutes the proceeds of drug activities, used by those engaged in illegal activities involving controlled substances. I have participated in investigations, in conjunction with other federal law enforcement agencies, of large-scale national and international drug trafficking organizations. These investigations have included the introduction of undercover officers and confidential informants into these groups and the implementation and management of electronic surveillance, including but not limited to State and Federal Title III Intercepts and Global Positioning Systems ("GPS"). I am a fluent Spanish speaker.

3. My training and experience has familiarized me with the manner in which Drug Trafficking Organizations (“DTO”) store, distribute, transport and sell illegal narcotics then collect and conceal the proceeds. I am familiar with the manner in which DTOs use vehicles, common carriers, mail and private delivery services and a variety of other methods to transport and distribute illegal narcotics, as well as the methods used to launder the proceeds of DTOs. I am familiar with the manner in which DTOs use codes or coded language via cellular telephone, pager or e-mail or others means to facilitate their activities. I am also familiar with the manner in which DTOs use vernacular or street names for drugs or proceeds in an attempt to disguise the subject of their conversations or operations. Moreover, I have received specialized training in the field of narcotics identification, investigation and enforcement.

4. I am submitting this affidavit in support of an application for a criminal complaint charging Glenn FREEMAN with possession with intent to distribute marijuana, in violation of 21 U.S.C. §841(a)(1).

5. As a result of my personal participation in this investigation, through my conversations with other law enforcement officers, upon information that I have received from a variety of other sources, including public records, and my analysis of reports prepared by other officers, I am familiar with all aspects of this investigation. This affidavit is intended to show only that there is sufficient probable cause for the requested complaint and does not set forth all of my knowledge about this matter.

**PROBABLE CAUSE**

6. On July 19, 2013, the Honorable David H. Hennessy, United States Magistrate Judge for the District of Massachusetts, authorized search warrants for the search of three (3) safe deposit boxes at the Chelsea Bank, 360 Broadway, Chelsea, Massachusetts. All three boxes were rented in Glenn FREEMAN's name. According to bank records, FREEMAN last accessed all three boxes on or about April 9, 2013.

7. On July 19, 2013, the FBI executed the search warrants and searched safe deposit boxes numbered 87, 243, and 339. As a result of the searches, the following items were located: Inside box #87, approximately \$14,970 in U.S. Currency; Inside box #243, approximately \$177,020 in U.S. Currency; Inside box #339, approximately \$139,380 in U.S. Currency.

8. On July 23, 2013, the Honorable David H. Hennessy, United States Magistrate Judge for the District of Massachusetts, authorized a search warrant for FREEMAN's residence, located at 77 Howlett Street, Topsfield, Massachusetts, for evidence of drug trafficking and money laundering activities, including drugs, firearms and documents.

9. On July 23, 2013, the FBI executed the search warrant at FREEMAN's house. FREEMAN, who returned home just prior to the initiation of the search, told agents that he lived at the residence alone.

10. Agents found and seized approximately 10 pounds of what appears to be marijuana during the search of FREEMAN's house. I believe the substance is marijuana because its texture, smell, and appearance are consistent with what I know through my

training and experience to be marijuana. Furthermore, a portion of the marijuana was field tested, and the results were positive for presumptive presence of marijuana.

11. A portion of the recovered marijuana was found in the kitchen freezer. The marijuana, which appeared to have been part of a larger brick of marijuana, was wrapped in a black plastic trash bag and duct tape.

12. In a second freezer located outside the kitchen area, agents recovered additional packages of marijuana. This marijuana was segregated into three plastic shopping bags, each of which contained marijuana that was packaged in clear, gallon-sized plastic bags.

13. Agents also recovered scales, packaging materials, and what appeared to be drug ledgers that recorded names with corresponding monetary amounts.

14. Agents recovered documents and records in FREEMAN's name, which indicate that he in fact lived at the residence. Also recovered from the front foyer closet were the following firearms:

- a) a Chinese SKS Type 56 rifle, bearing serial number 9001722, and large capacity magazine;
- b) a Remington, Model 870, 12 gauge shotgun, bearing serial number T601771V;
- c) a Thames Arms Co., unknown Model, .36 caliber revolver, loaded and bearing serial number 3887;
- d) a Walther, Model P38, 9 mm pistol, bearing serial number 81979;
- e) a Harrington & Richardson, Model Auto Ejecting 32, .32 caliber

revolver, bearing serial number 133410; and

f) a Rossi, Model M68, .38 special revolver, serial number D742609.

15. The handguns were found in a bag inside the front foyer closet. The AK-47 style firearm was found in a gun-bag found that was set on top of the bag containing the handguns. The shotgun was found on the top shelf in that same closet. Also on that shelf was a black nylon bag containing approximately \$90,000 in U.S. Currency.

16. Agents also recovered from FREEMAN's office records in FREEMAN's name. Immediately outside FREEMAN's office, agents recovered the following handguns, which were on display in plain view in a glass enclosed gun display case:

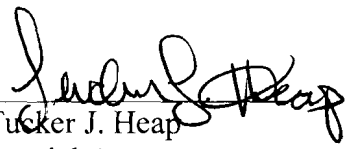
- a) a Crescent-Davis (Volunteer), unknown Model, 16 gauge shot gun, bearing serial number A895781;
- b) a Fratelli Pietta, Model Bingham PPS50 .22 caliber rifle, bearing serial number SA506.

17. Based on my training and experience, the manner in which the marijuana was packaged, the scales, packaging materials, apparent drug ledgers, firearms and U.S. Currency, all of which are indicia of drug trafficking and distribution, FREEMAN was placed under arrest. Accordingly, I am submitting this Affidavit in support of a criminal complaint charging FREEMAN with possession with intent to distribute marijuana, in violation of 21 U.S.C. § 841(a)(1).


**CONCLUSION**

Based on all of the foregoing, I respectfully submit that there is probable cause that Glenn FREEMAN possessed marijuana with the intent to distribute, in violation of 21 U.S.C. §841(a)(1).

Respectfully submitted,

  
Tucker J. Heap  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me  
on July 24, 2013:

  
HONORABLE DAVID H. HENNESSY  
UNITED STATES MAGISTRATE JUDGE

